

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

G.D., by and through his next friend,  
S.G.,

Plaintiff,

v.

Kannapolis City Schools Board of  
Education, Madison Peele, in her  
official and individual capacity, and  
Joshua Sain, in his official and  
individual capacity,

Defendants.

**Case No. 1:22-CV-01001-CCE-LPA**

**DEFENDANT MADISON PEELE’S  
MOTION FOR  
SUMMARY JUDGMENT**

Defendant Madison Peele (“Peele”), by and through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 56 and LR 56.1, respectfully moves this Court for entry of judgment in Peele’s favor on all claims alleged against her in the Amended Complaint (DE 30). In support of this Motion Peele presents to the Court her accompanying Brief—filed contemporaneously herewith—that shows there is no genuine issue of material fact and judgment as a matter of law is warranted as to all claims against Peele.

WHEREFORE, Peele respectfully requests this Court to grant Peele’s Motion for Summary Judgment and dismiss all of Plaintiff’s claims.

This the 17<sup>th</sup> day of March 2024.

**WOMBLE BOND DICKINSON (US) LLP**

s/ Alexander J. Buckley

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*Attorneys for Defendant Madison Peele*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed with the Court's CM/ECF system which will send a copy to all users registered to receive notice.

This the 17<sup>th</sup> day of March 2024.

/s/ Alexander J. Buckley  
Alexander J. Buckley (NCSB No. 53403)